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Attorneys for Respondent  
CHEVRON CORPORATION

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

*In re* Application of:  
THE REPUBLIC OF ECUADOR,  
  
Applicant,

For the Issuance of a Subpoena for the  
Taking of a Deposition and the Production  
of Documents in a Foreign Proceeding  
Pursuant to 28 U.S.C. § 1782

CHEVRON CORPORATION,  
  
Plaintiff,  
  
v.  
  
STEVEN DONZIGER, *et al.*,  
  
Defendant.

Case No. CV 10-80225 MISC CRB  
(And All Related Cases)

Case No. CV 12-80237 MISC EJD

**DECLARATION OF ETHAN D. DETTMER  
ON BEHALF OF CHEVRON  
CORPORATION IN SUPPORT OF  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER CASES SHOULD  
BE RELATED**

[Civ. L. R. 3-12]

1 I, Ethan D. Dettmer, declare:

2 1. I am a member of the State Bar of California, an attorney duly admitted to practice  
3 before this Court, and a partner in the law firm of Gibson, Dunn & Crutcher LLP, attorneys of record  
4 for Chevron Corporation in the within actions. I have personal knowledge of the facts set forth in this  
5 declaration.

6 2. The records on the Court's ECF system indicate that Defendants Steven Donziger  
7 *et al.* ("Defendants") filed their pending motion to quash on Friday, October 5, 2012. On the  
8 afternoon of October 5, I called Matthew M. Werdegarr (counsel for Defendants Steven Donziger,  
9 The Law Offices of Steven R. Donziger, and Donziger & Associates, PLLC) to ask if Defendants  
10 would stipulate to relate the motion to quash (a new miscellaneous action) to the § 1782 cases before  
11 Judge Breyer. I reached Mr. Werdegarr, and we discussed the issue. He indicated that he would  
12 check with his clients and co-counsel.

13 3. I again called Mr. Werdegarr on the morning of Monday, October 8, 2012. I reached  
14 him, and I asked whether a decision had been made about whether to stipulate. He stated that a  
15 decision had not yet been made.

16 4. During the afternoon of Monday, October 8, 2012, Larry R. Vasselka (counsel for  
17 Defendants Javier Piaguaje Payaguaje and Hugo Gerardo Camancho Naranjo) called me and left a  
18 voice mail message to inform me that he had discussed the issue with Mr. Werdegarr, and that they do  
19 not agree that the cases should be related.

20  
21 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
22 and correct.

23 Executed this 9th day of October, 2012, in San Francisco, California.

24  
25 /s/ Ethan D. Dettmer

26 \_\_\_\_\_  
Ethan D. Dettmer

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